

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant.

HEIDI YOAST,

Counterclaim-Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,
SHELLY COLE aka SHELLY HOWRIGON,
an individual, ROD REID, an individual,

Counterclaim-Defendants.

NO. 16-cv-1573-RSL

DECLARATION OF SHELLY COLE

Being duly sworn under her oath, Shelly Cole states as follows:

1. My name is Shelly Cole Howrigan a/k/a Shelly Cole. I am over the age of twenty-one (21) and under no legal disability.

2. I have personal knowledge of the facts set forth herein and if called to testify would state and allege the following.

AFFIDAVIT OF SHELLY COLE IN SUPPORT OF HER MOTION
TO DISMISS COUNTERCLAIM
(16-cv-1573-RSL)

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1 3. I attended the Job's Daughters International Supreme Session in July 2016 in

2 Grand Rapids, Michigan. During that Session, I presented at two (2) town hall meetings and the
3 business meeting changes that JDI was making to its by-laws with respect to the use of JDI's
4 trademarks. I also met with members of the Virginia JDI delegation after one of the town hall
5 meetings to discuss questions they had on the proposed trademark changes.

6 4. At no time any of these presentations or meetings did I use the name Heidi Yoast
7 (or a Past Grand Bethel Honored Queen from the State of Washington). Furthermore, at those
8 presentations or meetings, I never stated that Heidi Yoast had been sent cease and desist letters
9 from JDI, that Heidi Yoast was using JDI trademarks without permission, or that any one should
10 not buy product from Heidi Yoast. Furthermore, I never pulled up any social media account or
11 website belonging to Heidi Yoast.

12 I declare under penalty of perjury that the foregoing is true and correct to the best of my
13 knowledge and recollection.

14 DATED this 5th day of March at Las Vegas, Nevada

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16 SHELLEY COLE

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27 AFFIDAVIT OF SHELLEY COLE (16-cv-1573-RSL)

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2018, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 5 th day of March, 2017.

s/ Rodney L. Umberger

s/ Daniel J. Velloth

Rodney L. Umberger, Jr., WSBA #24948

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AFFIDAVIT OF SHELLY COLE (16-cv-1573-RSL)

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